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November 18, 1987

Mr. William J. Tricarico  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: MM Docket No. 87-268  
RM-5811

Dear Mr. Tricarico:

Transmitted herewith are the original and eleven copies of "Comments of George N. Gillett, Jr." to be filed in the above referenced matter. These comments are directed to the attention of the full Commission.

Should any questions arise concerning this, please communicate with this office.

Very truly yours,

  
Peter Gutmann

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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Federal Communications Commission  
Office of the Secretary

In the Matter of  
  
Advanced Television Systems  
and Their Impact on the  
Existing Broadcast Service

Review of Technical and  
Operational Requirements:  
Part 73-E, Television  
Broadcast Stations

Reevaluation of the UHF  
Television Channel and  
Distance Separation  
Requirements of Part 73 of  
the Commission's Rules

MM Docket No. 87-268  
RM-5811

TO: The Commission

COMMENTS OF GEORGE N. GILLETT, JR.

George N. Gillett, Jr. ("Gillett"), by his attorneys, hereby respectfully submits his comments in the referenced matter in response to the Commission's Notice of Inquiry, 2 FCC Rec. 5125 (1987).

Gillett fully supports and joins in the initial comments filed by the Association of Maximum Service Telecasters ("MST"). In these separate comments Gillett wishes to emphasize several related concerns, all of which emanate from the extraordinary level of local service which television broadcasters generally, and Gillett in particular, render to their respective communities.

From the very outset, the American system of television broadcasting has been founded upon the concept of local program service. Allocation criteria, network restrictions, public file requirements, problems/issues lists, the petition to deny process, comparative renewals, programming guidelines, comparative selection criteria, and even the residual formal obligations under present deregulation - all of these stem from the fundamental axiom that a television broadcaster must devote himself in substantial part to serving the needs of his community of license and service area. Evidence that broadcasters fulfill this role is so commonplace that it is often taken for granted, but if any recent evidence is needed, the Commission's attention is directed to the current (November 16) issue of Broadcasting magazine, in which pages 55-128 are devoted to a survey of spot news and local public affairs programming broadcast by local telecasters over the past year.

Despite scattered exceptions, the fact is that television stations alone provide local video information to American viewers. While the Commission often refers to the prevalence of competing video distribution media, the number of such alternative media - cable, video tapes, satellite, and the like - which distribute meaningful information oriented

to the local needs of video users are few and far between. Local television broadcasting has always been and remains the bedrock of our video information distribution system. Any action by the Commission, or a failure to act, which even indirectly harms local broadcasters' ability to compete with alternative media will invariably have a significant, detrimental impact upon the public which those stations serve. Thus, the public interest demands that the Commission take special care to guard the vitality of these essential and irreplaceable sources of video information.

Gillett has always prided himself in emphasizing a commitment to excellence in news and local service on his owned and operated stations. Part of that excellence consists of the technical quality of the medium by which information is conveyed to the viewer. For that reason alone, Gillett intends to employ all reasonable means to maintain the level of technical excellence in order to provide his viewers with the quality he believes they deserve. But there are two fundamental challenges to be faced. First, it is not simply a question of what viewers deserve, but rather of what they will come to expect. Second, Gillett's commitment to local service is an expensive one. Unless television licensees are able to keep pace with technological development, those media

that are able to benefit from the state of the art will deprive local broadcasters of viewers and erode the financial base which enables broadcasters to provide local informational service. And that, in turn, will have a direct adverse impact upon the quality of programming which can be provided to those viewers who remain loyal to local television (or who are forced financially to forego more expensive and/or subscription technologies).

Gillett is also concerned that any transition to HDTV service must entail as minimal as possible a disruption to local broadcasters' ability to continue serving their community. The nature and severity of such potential disruption will depend, of course, upon the type of system ultimately authorized. Gillett simply notes at this juncture that, to the extent necessary, the Commission must be fully prepared to waive its duopoly and other rules in order to insure that no viewer is deprived of service during any changeover period to a technology which is not fully compatible with the universe of existing NTSC receivers.

In sum, while Gillett concurs with MST's comments, he wishes to emphasize the special service rendered by television broadcasters to local viewers. The Commission must regard as a paramount consideration the need to ensure that such service

will continue and will not be hampered by an inability to match the technology promised by other media which will rise to meet the challenge and embrace the opportunities of an advanced television system.

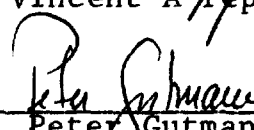
Respectfully submitted

GEORGE N. GILLET, JR.

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